



P.O. Box 1045, Bullhead City, AZ 86430

October 21, 2004

Ms. Jean Gray
Western Area Power Administration
Post Office Box 6457
Phoenix, Arizona 85005-6457

Re: Comments on Revisions to Section 12 of P-DP and GPCP

Dear Ms. Gray:

Mohave Electric Cooperative, Inc. is an eligible applicant under Federal Preference Law for an allocation of Parker-Davis power and energy. Mohave Electric will not be applying for a part of the Parker-Davis pool because it is already receiving Parker-Davis power and energy through an extension of its Partial Requirements Contract with AEP. Nevertheless, Mohave has concerns about language in the proposed Parker-Davis Project contract as well as the GPCP.

In particular, Mohave has been concerned about clearly protecting the rights of contract holders. Mohave Electric has reviewed comments from a variety of parties. Mohave has most recently reviewed the comments of Navopache Electric Cooperative with suggested revisions to Section 12.

Mohave Electric believes that the Navopache language is protective of customer rights to judicial appeal in the event of an abuse by Western of its authorities. Mohave would support incorporation of the Navopache language.

Very truly yours,
MOHAVE ELECTRIC COOPERATIVE, INC.

Thomas Longtin
Manager of Operations and Engineering